

EAG:PGS  
F. #2015R00067

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

15-CR-018 (FB)

CHEVELLE NESBETH,

Defendant.

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THE GOVERNMENT'S VOIR DIRE REQUESTS

The government respectfully requests that in addition to the Court's usual voir dire questions, the Court ask the following case-specific questions in jury selection for this case. The government respectfully submits that the questions listed below would aid in the selection of a fair, impartial and unbiased jury. In addition, the government submits a brief summary of the case, as well as a list of persons that the government expects to be mentioned at trial.

I. Case-Specific Questions

1. This case is the result of an investigation by Homeland Security Investigations or "HSI," which was formerly known as Immigration and Customs Enforcement or "ICE." Have you or anyone you know had any experience with HSI or ICE? If so, please describe the nature of that experience, and whether you considered it positive or negative.

2. This case also involves officers from Customs and Border Protection. Have you or anyone you know had any experience with Customs and Border Protection? If so, please describe the nature of that experience, and whether you considered it positive or negative.

3. In this case, the defendant is charged with importation of cocaine and possession of cocaine with the intent to distribute it. Do you have any strong feelings concerning the importation, use, distribution, or sale of illegal drugs? Do you believe that the use or possession of narcotic drugs such as cocaine should be legal in the United States?

4. If you answered yes to Questions 1, 2 or 3, would this affect your ability to be fair and impartial in this case?

5. Is there anything that we have not directly addressed that would make it difficult for you to be a fair and impartial juror in this case?

## II. Description of the Case

On January 6, 2015, the defendant Chevelle Nesbeth arrived at John F. Kennedy Airport aboard a JetBlue Airlines flight from Montego Bay Jamaica. During a Customs and Border Protection officer's examination of the defendant's suitcase, the officer found approximately 602 grams, or 1.3 pounds, of cocaine hidden in the defendant's suitcase. The defendant is charged with (1) importing cocaine into the United States, and (2) possessing cocaine with the intent to distribute it.

## III. Persons Involved

1. Chevelle Nesbeth (Defendant)
2. Amanda David (Defense Counsel)
3. Michael Weil (Defense Counsel)
4. Paul Scotti (AUSA)
5. Elizabeth Geddes (AUSA)
6. Magdalena St. Surin (Paralegal, USAO)
7. Special Agent Shannon McFadden (Homeland Security Investigations)
8. Officer Giuseppe D'Andrea (Customs and Border Protection)

9. Special Agent Kyler Hardin (Homeland Security Investigations)
10. Michael White (Forensic Chemist, Drug Enforcement Administration)
11. Special Agent Daniel Suden (Homeland Security Investigations)
12. Special Agent Donald Farrier (Homeland Security Investigations)

IV. Entities or Places that May be Mentioned

1. Montego Bay, Jamaica
2. Kingston, Jamaica
3. JetBlue Airlines
4. Caribbean Airlines

Dated: Brooklyn, New York  
June 12, 2015

Respectfully submitted,

KELLY T. CURRIE  
Acting United States Attorney

By: /s/ Paul G. Scotti  
Paul G. Scotti  
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